

# Exhibit B

**From:** Renan F. Varghese  
**Sent:** Wednesday, January 26, 2022 7:48 PM  
**To:** 'Fischer, Rachel S.'; Grossman-Boder, Yonatan L.; Christina Sabato; Michael J. Willemin  
**Cc:** McKenna, Kathleen M.  
**Subject:** RE: Eckhart v. Fox News LLC, et al - Hit reports  
**Attachments:** Pls Revised ESI Search Terms v3.DOCX

**Categories:** In progress

Rachel-

As discussed.

Thanks,

**Renan F. Varghese**  
*Of Counsel*

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**From:** Fischer, Rachel S.  
**Sent:** Tuesday, January 25, 2022 9:40 PM  
**To:** Renan F. Varghese ; Grossman-Boder, Yonatan L. ; Christina Sabato ; Michael J. Willemin  
**Cc:** McKenna, Kathleen M.  
**Subject:** RE: Eckhart v. Fox News LLC, et al - Hit reports

That works. We will send a dial-in.

**Rachel S. Fischer**  
Senior Counsel

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---

**From:** Renan F. Varghese <[RVarghese@wigdorlaw.com](mailto:RVarghese@wigdorlaw.com)>  
**Sent:** Tuesday, January 25, 2022 4:49 PM  
**To:** Fischer, Rachel S. <[rfischer@proskauer.com](mailto:rfischer@proskauer.com)>; Grossman-Boder, Yonatan L. <[YGrossman-Boder@proskauer.com](mailto:YGrossman-Boder@proskauer.com)>; Christina

Sabato <[csabato@wigdorlaw.com](mailto:csabato@wigdorlaw.com)>; Michael J. Willemine <[mwillemine@wigdorlaw.com](mailto:mwillemine@wigdorlaw.com)>

**Cc:** McKenna, Kathleen M. <[KMckenna@proskauer.com](mailto:KMckenna@proskauer.com)>

**Subject:** RE: Eckhart v. Fox News LLC, et al - Hit reports

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I can't then as I have depositions tomorrow. I can do it around the same time, 4?

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**From:** Fischer, Rachel S. <[rfischer@proskauer.com](mailto:rfischer@proskauer.com)>

**Sent:** Monday, January 24, 2022 10:33 PM

**To:** Renan F. Varghese <[RVarghese@wigdorlaw.com](mailto:RVarghese@wigdorlaw.com)>; Grossman-Boder, Yonatan L. <[YGrossman-Boder@proskauer.com](mailto:YGrossman-Boder@proskauer.com)>;

Christina Sabato <[csabato@wigdorlaw.com](mailto:csabato@wigdorlaw.com)>; Michael J. Willemine <[mwillemine@wigdorlaw.com](mailto:mwillemine@wigdorlaw.com)>

**Cc:** McKenna, Kathleen M. <[KMckenna@proskauer.com](mailto:KMckenna@proskauer.com)>

**Subject:** RE: Eckhart v. Fox News LLC, et al - Hit reports

I am not available at 4 tomorrow. Can you do 9 or 9:30 am on Wednesday?

All searches have been de-duped - the overall hit count de-duped across all searches is 244,996.

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**From:** Renan F. Varghese <[RVarghese@wigdorlaw.com](mailto:RVarghese@wigdorlaw.com)>

**Sent:** Monday, January 24, 2022 4:56 PM

**To:** Grossman-Boder, Yonatan L. <[YGrossman-Boder@proskauer.com](mailto:YGrossman-Boder@proskauer.com)>; Christina Sabato <[csabato@wigdorlaw.com](mailto:csabato@wigdorlaw.com)>; Michael J. Willemine <[mwillemine@wigdorlaw.com](mailto:mwillemine@wigdorlaw.com)>

**Cc:** McKenna, Kathleen M. <[KMckenna@proskauer.com](mailto:KMckenna@proskauer.com)>; Fischer, Rachel S. <[rfischer@proskauer.com](mailto:rfischer@proskauer.com)>

**Subject:** RE: Eckhart v. Fox News LLC, et al - Hit reports

**This email originated from outside the Firm.**

I can do a call tomorrow at 4. Also, do the numbers in the upper left reflect the de-duped search results? If not, please provide those numbers as they are obviously the relevant point of analysis.

Thanks,

**Renan F. Varghese**  
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---

**From:** Grossman-Boder, Yonatan L. <[YGrossman-Boder@proskauer.com](mailto:YGrossman-Boder@proskauer.com)>  
**Sent:** Monday, January 24, 2022 3:47 PM  
**To:** Renan F. Varghese <[RVarghese@wigdorlaw.com](mailto:RVarghese@wigdorlaw.com)>; Christina Sabato <[csabato@wigdorlaw.com](mailto:csabato@wigdorlaw.com)>; Michael J. Willemine <[mwillemine@wigdorlaw.com](mailto:mwillemine@wigdorlaw.com)>  
**Cc:** McKenna, Kathleen M. <[KMckenna@proskauer.com](mailto:KMckenna@proskauer.com)>; Fischer, Rachel S. <[rfischer@proskauer.com](mailto:rfischer@proskauer.com)>  
**Subject:** RE: Eckhart v. Fox News LLC, et al - Hit reports

Hi Renan,

Following up on Rachel's email from yesterday as we had not heard back from you. Please see attached the updated hit counts based on your revisions. Please let us know your availability for a call tomorrow and Wednesday to continue our discussions.

Best,  
Yoni

**Yonatan Grossman-Boder**

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(he/him)  
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greenspaces



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**From:** Fischer, Rachel S. <[rfischer@proskauer.com](mailto:rfischer@proskauer.com)>  
**Sent:** Sunday, January 23, 2022 4:39 PM  
**To:** McKenna, Kathleen M. <[KMckenna@proskauer.com](mailto:KMckenna@proskauer.com)>

**Cc:** Renan F. Varghese <[RVarghese@wigdorlaw.com](mailto:RVarghese@wigdorlaw.com)>; Christina Sabato <[csabato@wigdorlaw.com](mailto:csabato@wigdorlaw.com)>; Michael J. Willemin <[mwillemin@wigdorlaw.com](mailto:mwillemin@wigdorlaw.com)>; Grossman-Boder, Yonatan L. <[YGrossman-Boder@proskauer.com](mailto:YGrossman-Boder@proskauer.com)>

**Subject:** Re: Eckhart v. Fox News LLC, et al - Hit reports

Renan, I can do noon on Tuesday. Let us know if that works.

**Rachel S. Fischer**

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On Jan 21, 2022, at 1:11 PM, McKenna, Kathleen M. <[KMckenna@proskauer.com](mailto:KMckenna@proskauer.com)> wrote:

Renan: That does not accurately represent our position during the meet and confer call on January 13. I expressed surprise that you began the call inquiring about ESI which was not the subject of the exchange of letters and was additionally a surprise as we had not yet received plaintiff's response to our changes proposed in November on ESI protocol. I stated that we knew that certain of your search terms were producing huge hit counts, others where hit counts seemed unnecessary and yet other terms where it is entirely unclear what the purpose is of the search. The meet & confer which followed and the information we provided supports my earlier comments. Your reply of late last evening appears of value and the postponement I understand Rachel to be suggesting is for purposes of analyzing what you just sent. I leave it to Rachel to comment on the timetable but I thought it important that the representations of our discussions be clear. Regards, Kathleen

**Kathleen M. McKenna**

(she / her)

Partner

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**From:** Renan F. Varghese <[RVarghese@wigdorlaw.com](mailto:RVarghese@wigdorlaw.com)>

**Sent:** Friday, January 21, 2022 12:34 PM

**To:** Fischer, Rachel S. <[rfischer@proskauer.com](mailto:rfischer@proskauer.com)>

**Cc:** Christina Sabato <[csabato@wigdorlaw.com](mailto:csabato@wigdorlaw.com)>; Michael J. Willemin <[mwillemin@wigdorlaw.com](mailto:mwillemin@wigdorlaw.com)>; McKenna, Kathleen M. <[KMckenna@proskauer.com](mailto:KMckenna@proskauer.com)>; Grossman-Boder, Yonatan L. <[YGrossman-Boder@proskauer.com](mailto:YGrossman-Boder@proskauer.com)>

**Subject:** RE: Eckhart v. Fox News LLC, et al - Hit reports

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Rachel-

This is why I had asked Kathleen for the hit report when we spoke two weeks ago. She indicated that we did not need the hit report because Fox had very few objections to our search terms. But then when we got on the call on Wednesday we found out that this was not the case and Fox had substantial objections, which you wanted to go over during that call, without providing us with a hit report beforehand. As we discussed, this was untenable for us without having the numbers in front of us which you sent later in the day on Wednesday. If Fox had simply provided the hit report when it was originally run, or even when we asked for it, this process would have gone much faster. We can schedule a time next week to go over our new terms. How is Tuesday afternoon? If we do not have an agreement on the terms in place next week, we will have to go to the Court.

Thanks,

**Renan F. Varghese**  
*Of Counsel*

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**From:** Fischer, Rachel S. <[rfischer@proskauer.com](mailto:rfischer@proskauer.com)>  
**Sent:** Friday, January 21, 2022 12:26 PM  
**To:** Renan F. Varghese <[RVarghese@wigdorlaw.com](mailto:RVarghese@wigdorlaw.com)>  
**Cc:** Christina Sabato <[csabato@wigdorlaw.com](mailto:csabato@wigdorlaw.com)>; Michael J. Willemin <[mwillemin@wigdorlaw.com](mailto:mwillemin@wigdorlaw.com)>; McKenna, Kathleen M. <[KMckenna@proskauer.com](mailto:KMckenna@proskauer.com)>; Grossman-Boder, Yonatan L. <[YGrossman-Boder@proskauer.com](mailto:YGrossman-Boder@proskauer.com)>  
**Subject:** RE: Eckhart v. Fox News LLC, et al - Hit reports

Thank you Renan. We are in the process of re-running the search terms with your revisions. It seems that it would be most efficient for us to reschedule our 1pm call until after we have had the chance to review updated hit reports. Let us know if you agree with that.

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**From:** Renan F. Varghese <[RVarghese@wigdorlaw.com](mailto:RVarghese@wigdorlaw.com)>  
**Sent:** Thursday, January 20, 2022 10:26 PM  
**To:** Fischer, Rachel S. <[rfischer@proskauer.com](mailto:rfischer@proskauer.com)>  
**Cc:** Christina Sabato <[csabato@wigdorlaw.com](mailto:csabato@wigdorlaw.com)>; Michael J. Willemin <[mwillemin@wigdorlaw.com](mailto:mwillemin@wigdorlaw.com)>; McKenna, Kathleen M. <[KMckenna@proskauer.com](mailto:KMckenna@proskauer.com)>; Grossman-Boder, Yonatan L. <[YGrossman-Boder@proskauer.com](mailto:YGrossman-Boder@proskauer.com)>

**Subject:** RE: Eckhart v. Fox News LLC, et al - Hit reports

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Rachel-

See our edits attached.

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---

**From:** Fischer, Rachel S. <[rfischer@proskauer.com](mailto:rfischer@proskauer.com)>  
**Sent:** Wednesday, January 19, 2022 5:59 PM  
**To:** Renan F. Varghese <[RVarghese@wigdorlaw.com](mailto:RVarghese@wigdorlaw.com)>  
**Cc:** Christina Sabato <[csabato@wigdorlaw.com](mailto:csabato@wigdorlaw.com)>; Michael J. Willemin <[mwillemin@wigdorlaw.com](mailto:mwillemin@wigdorlaw.com)>; McKenna, Kathleen M. <[KMckenna@proskauer.com](mailto:KMckenna@proskauer.com)>; Grossman-Boder, Yonatan L. <[YGrossman-Boder@proskauer.com](mailto:YGrossman-Boder@proskauer.com)>  
**Subject:** Eckhart v. Fox News LLC, et al - Hit reports

Renan,

Further to our discussion this afternoon, please see attached.

Rachel

**Rachel S. Fischer**  
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## PLAINTIFF'S PROPOSED SEARCH TERMS – 1/20/22

Search Number	Custodian	Time Period	Keywords <sup>1</sup>
1)	Jennifer Eckhart	January 1, 2013 through <del>present</del> <u>July 1, 2020</u>	<ul style="list-style-type: none"> <li>• Discrim! /20 (Treat! OR Act! OR Perform! Or conduct)</li> <li>• Haras! /20 (Treat! OR Act! OR Perform! Or conduct)</li> <li>• Hostil! /20 (Treat! OR Act! OR Perform!)</li> <li>• Unfair! /20 (Treat! OR Act! OR Perform!)</li> <li>• <del>Justif!</del></li> <li>• <del>Unjust!</del></li> <li>• Not w/4 fair!</li> <li>• Mistreat!</li> <li>• <del>(Treat! OR Act! OR Perform!) w/4 (Bad! OR Neg! OR Poor!)</del></li> <li>• Promot! /20 (Responsib! Or Perform! Or air or anchor or reporter)</li> <li>• Deserv! /20 (Responsib! Or Perform! Or air or anchor or reporter)</li> <li>• Warrant! /20 (Responsib! Or Perform! Or air or anchor or reporter)</li> <li>• Inappropriat! /20 (behavior or conduct or treat! Or act!)</li> <li>• Appropriat! /20 (behavior or conduct or treat! Or act!)</li> <li>• Offensive or offend!</li> <li>• Uncomfortab!</li> <li>• Not w/4 comfortab!</li> <li>• Saxis!</li> <li>• <del>Flirt!</del></li> <li>• Bitch</li> <li>• (Respect! OR Disrespect! OR Offensiv!) w/5 (Comment! OR Treat! OR Languag!)</li> <li>• “Disparate treatment”</li> <li>• <del>EEO!</del></li> <li>• <del>“Equal Employment”</del></li> <li>• Unhapp!</li> </ul>

<sup>1</sup> Search terms are not case sensitive and “!” indicates a wild card root expander (e.g., appl! matches apple, application, applied, applicant and so on).

			<ul style="list-style-type: none"> <li>• <u>Henry AND Ed! <u>AND</u></u></li> <li>•</li> <li>•</li> </ul>
	<u>Jennifer Eckhart</u>	<u>January 1, 2013 through present</u>	<ul style="list-style-type: none"> <li>• <u>Ed! Or Henry /20 of any of the following terms</u></li> <li>• <u>Discrim!</u></li> <li>• <u>Haras!</u></li> <li>• <u>Hostil!</u></li> <li>• <u>Unfair!</u></li> <li>• <u>Justif!</u></li> <li>• <u>Unjust!</u></li> <li>• <u>Not w/4 fair!</u></li> <li>• <u>Mistreat!</u></li> <li>• <u>(Treat! OR Act! OR Perform!) w/4 (Bad! OR Neg! OR Poor!)</u></li> <li>• <u>Inappropriat! /20 (behavior or conduct or treat! Or act!)</u></li> <li>• <u>Appropriat! /20 (behavior or conduct or treat! Or act!)</u></li> <li>• <u>Offensive or offend!</u></li> <li>• <u>Uncomfortab!</u></li> <li>• <u>Not w/4 comfortab!</u></li> <li>• <u>Sexis!</u></li> <li>• <u>Flirt!</u></li> <li>• <u>Bitch</u></li> <li>• <u>(Respect! OR Disrespect! OR Offensiv!) w/5 (Comment! OR Treat! OR Languag!)</u></li> <li>• <u>"Disparate treatment"</u></li> <li>• <u>Unhapp!</u></li> <li>•</li> <li>•</li> </ul>
2)	Liz Claman Brad Hirst Kevin Burke	January 1, 2013 through present	<ul style="list-style-type: none"> <li>• Eckhart w/25 of any of the following terms               <ul style="list-style-type: none"> <li>○ Perform!</li> <li>○ Employ!</li> <li>○ Compens!</li> <li>○ Terminat!</li> <li>○ <u>Hire</u></li> <li>○ <u>Hired</u></li> <li>○ <u>Hiring!</u></li> <li>○ Promot!</li> <li>○ Potential</li> <li>○ Improv!</li> <li>○ PIP</li> <li>○ Career</li> <li>○ Discipline!</li> <li>○ Compl!</li> </ul> </li> </ul>

3)	Thomas Bowman	January 1, 2013 through present	<ul style="list-style-type: none"> <li>• Eckhart</li> </ul>
4)	Liz Claman	January 1, 2013 through present	<ul style="list-style-type: none"> <li>• Eckhart w/25 of any of the following terms               <ul style="list-style-type: none"> <li>○ Babysit!</li> <li>○ Clean!</li> <li>○ Shoes</li> <li>○ Dress</li> <li>○ Lunch</li> <li>○ Coffee</li> <li>○ Pizza</li> <li>○ Senator</li> <li>○ Zoom</li> </ul> </li> </ul>
5)	Liz Claman Brad Hirst Edward Henry Denise Collins	January 1, 2013 through present	<ul style="list-style-type: none"> <li>• <del>Gender</del></li> <li>• <u>Discrim! /20 Treat!</u></li> <li>• <u>Discrim! /20 behavior</u></li> <li>• <u>Discrim! /20 conduct</u></li> <li>• <u>Discrimin! /20 Act!</u></li> <li>• <u>Discrim! /20 decision</u></li> <li>• <u>Discrim! /20 against</u></li> <li>• <u>Discrim! /20 me</u></li> <li>• <u>Discrim! /20 her</u></li> <li>• <u>Discrim! /20 gender</u></li> <li>• <u>Discrim! /20 women</u></li> <li>• <u>Discrim! /20 sex!</u></li> <li>• <u>Discrim! /20 complain!</u></li> <li>• <u>Harass! /20 Treat!</u></li> <li>• <u>Harass! /20 behavior</u></li> <li>• <u>Harass! /20 conduct</u></li> <li>• <u>Harass! /20 Act!</u></li> <li>• <u>Harass! /20 decision</u></li> <li>• <u>Harass! /20 against</u></li> <li>• <u>Harass! /20 me</u></li> <li>• <u>Harass! /20 her</u></li> <li>• <u>Harass! /20 gender</u></li> <li>• <u>Harass! /20 women</u></li> <li>• <u>Harass! /20 sex!</u></li> <li>• <u>_____</u></li> <li>• <del>Harass!</del></li> <li>• MeToo</li> <li>• Bitch</li> <li>• Cunt</li> <li>• Whore</li> </ul>

			<ul style="list-style-type: none"> <li>• Slut</li> <li>• Sex!</li> </ul>
6)	Edward Henry	January 1, 2013 through present	<ul style="list-style-type: none"> <li>• <del>Eckhart</del></li> <li>• “Hard to get”</li> <li>• <del>Drinks</del></li> <li>• Marquis</li> <li>• Obey</li> <li>• <del>Punish!</del></li> <li>• Submissive</li> <li>• <del>Sex</del></li> <li>• Blow job</li> <li>• Blowjob</li> <li>• <del>Oral</del></li> <li>• Fellatio</li> <li>• Tongue</li> <li>• Lick</li> <li>• Heisman</li> <li>• <del>Dating</del></li> <li>• Go! /2 out /20 (hotel or sex!)</li> <li>• Com! /2 out /20 (hotel or sex!)</li> <li>• Com! /2 on /20 (hotel or sex!)</li> <li>• Sexy</li> <li>• Hot /20 (she or her or woman or women)</li> <li>• <del>Attractive</del></li> <li>• Breasts</li> <li>• Boobs</li> <li>• Puss!</li> <li>• Tits</li> <li>• Ass</li> <li>• Cock</li> <li>• <del>Dick</del></li> <li>• Whore</li> <li>• Grope</li> <li>• Anal</li> <li>• Mentor</li> <li>• <del>Brooke or</del> Hammerling</li> <li>• Roxie or Marroquin</li> <li>• Cathy or Areu</li> </ul>
	<u>Edward Henry</u>	<u>January 1, 2013 through present</u>	<u>Eckhart /20 of any of the following terms</u> <ul style="list-style-type: none"> <li>• <u>Punish</u></li> <li>• <u>Sex</u></li> <li>• <u>Dating</u></li> <li>• <u>Hot</u></li> <li>• <u>“Hard to get”</u></li> <li>• <u>Marquis</u></li> </ul>

			<ul style="list-style-type: none"> <li>• <u>Obey</u></li> <li>• <u>Submissive</u></li> <li>• <u>Blow job</u></li> <li>• <u>Blowjob</u></li> <li>• <u>Oral</u></li> <li>• <u>Fellatio</u></li> <li>• <u>Tongue</u></li> <li>• <u>Lick</u></li> <li>• <u>Heisman</u></li> <li>• <u>Go! /2 out /20 (hotel or sex!)</u></li> <li>• <u>Com! /2 out /20 (hotel or sex!)</u></li> <li>• <u>Com! /2 on /20 (hotel or sex!)</u></li> <li>• <u>Sexy</u></li> <li>• <u>  </u></li> <li>• <u>Attractive</u></li> <li>• <u>Breasts</u></li> <li>• <u>Boobs</u></li> <li>• <u>Puss!</u></li> <li>• <u>Tits</u></li> <li>• <u>Ass</u></li> <li>• <u>Cock</u></li> <li>• <u>Dick</u></li> <li>• <u>Whore</u></li> <li>• <u>Grope</u></li> <li>• <u>Anal</u></li> <li>• <u>Mentor</u></li> <li>• <u>Hammerling</u></li> <li>• <u>Roxie or Marroquin</u></li> <li>• <u>Cathy or Areu</u></li> </ul>
7)	Denise Collins Brad Hirst <u>Bill Shine</u> <u>Kevin Lord</u> <u>Jay Wallace</u> <u>Lauren Petterson</u>	January 1, 2020 through present	<ul style="list-style-type: none"> <li>• Eckhart w/25 of any of the following: <ul style="list-style-type: none"> <li>○ Repercussion</li> <li>○ Compl!</li> <li>○ Abuse</li> <li>○ Toxic!</li> <li>○ Hostil!</li> <li>○ Environment!</li> <li>○ Compl!</li> <li>○ Sex!</li> <li>○ Lawsuit</li> <li>○ Groom!</li> <li>○ <u>Investigat!</u></li> <li>○ <u>Discrim!</u></li> <li>○ <u>Harass</u></li> </ul> </li> </ul>
8)	Bill Shine  Kevin Lord	January 1, 2013 to	<ul style="list-style-type: none"> <li>• Discrim! <u>AND-10</u> (Gender or sex!)</li> <li>• Harass! <u>/10AND</u> (Gender or sex!)</li> </ul>

	Jay Wallace Lauren Petterson	January 1, 20 <del>+</del> 20	<p>• <del>Eckhart</del></p> <ul style="list-style-type: none"> <li>• “Paul Weiss” /10 invest!</li> <li>• Henry /20 any of the following               <ul style="list-style-type: none"> <li>○ Assault</li> <li>○ Attack</li> <li>○ Rape</li> <li>○ Pressure</li> <li>○ Complain!</li> <li>○ Object</li> <li>○ Compensation</li> <li>○ (Own or personal or his) /10 (show or program or air or host or anchor or co-anchor)</li> <li>○ Profile</li> <li>○ Reput!</li> <li>○ Flirt!</li> <li>○ Woman</li> <li>○ Women</li> <li>○ Girl!</li> <li>○ Rap!</li> <li>○ Sex!</li> <li>○ Relation!</li> <li>○ Disciplin!</li> <li>○ Revenu!</li> <li>○ Hammerling</li> <li>○ Roxie or Marroquin</li> <li>○ Areu</li> <li>○ Hufsa or Kamal</li> <li>○ Lawsuit</li> <li>○ Groom!</li> <li>○ Terminat!</li> <li>○ Object!</li> <li>○ Approp!</li> <li>○ Inapprop!</li> <li>○ Comfortab!</li> <li>○ Uncomfortabl!</li> <li>○ Unfair</li> <li>○ Fair</li> <li>○ Promot!</li> </ul> </li> <li>• <del>Date!</del></li> <li>○ Drinks</li> <li>○ Uncomfortable</li> <li>○ Ailes</li> <li>○ Go! /2 out</li> <li>○ Com! /2 out</li> <li>○ Com! /2 on</li> <li>○ Sexy</li> <li>○ Hot</li> <li>○ Attractive</li> <li>○ Breasts</li> </ul>
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			<ul style="list-style-type: none"> <li>○ Boobs</li> <li>○ Puss!</li> <li>○ Tits</li> <li>○ Vagina</li> <li>○ Ass</li> <li>○ Cock</li> <li>○ Dick</li> <li>○ Affair</li> <li>○ Hotel</li> <li>○ Whore</li> <li>○ Grope</li> </ul>
9)	Bill Shine Kevin Lord Jay Wallace Lauren Petterson	January 1, 2013 to January 1, 20120	<ul style="list-style-type: none"> <li>● Complain! /20 sex <u>AND Employee</u></li> <li>● Complain! /20 abus! <u>AND Employee</u></li> <li>● Complain! /20 sexual <u>AND Employee</u></li> <li>● Complain! /20 gender <u>AND Employee</u></li> <li>● Object /20 sex <u>AND Employee</u></li> <li>● Object! /20 abus!</li> <li>● Object /20 sexual</li> <li>● Object /20 gender</li> <li>● <del>Retaliat!</del></li> <li>● <u>Employee AND Harass!</u> /20 sex</li> <li>● Harass! /20 gender <u>AND Employee</u></li> <li>● <u>Employee AND Harass!</u> /20 sexual</li> <li>● Harass! /20 abus! <u>AND Employee</u></li> <li>● <del>Affair</del></li> <li>● Assault /20 sex</li> <li>● Assault /20 gender</li> <li>● Assault /20 sexual</li> <li>●</li> <li>● Rape <u>and Employee</u></li> <li>● Hostil! /20 sex</li> <li>● Hostil! /20 gender</li> <li>● Hostil! /20 sexual</li> <li>● Bitch</li> <li>● Cunt</li> <li>● Whore</li> <li>● Uncomfortabl!</li> <li>● <u>Not /4 comfortable</u></li> </ul>

			<ul style="list-style-type: none"><li>• Britt /4 McHenry /10<ul style="list-style-type: none"><li>○ Complain!</li><li>○ Harass!</li><li>○ Unfair</li><li>○ Uncomfortab!</li><li>○ Sex!</li><li>○ Retaliat!</li><li>○ Assault</li><li>○ Uncomfortable</li><li>○ Not /4 comfortabl!</li><li>○ Whore</li><li>○ Bitch</li><li>○ Slut</li><li>○ Jokes</li><li>○</li></ul></li></ul>
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